On October 14, 2021, EPA's Office of Brownfields & Land Revitalization held a webinar to assist applicants with preparing applications for the Fiscal Year 2022 Community-wide Assessment Grants for States and Tribes. Below is a transcript of questions submitted by participants and EPA's response. Responses below may include additional information than what was provided during the webinar.

If you have general questions about EPA's Brownfields Program or questions about a specific site for which you're seeking funding, please contact your Regional Brownfields Contact listed in Section VII. of the Guidelines. If you have questions on how to submit an application through www.grants.gov, please visit the "APPLICANTS" tab on the grants.gov website for information.

GENERAL QUESTIONS & ANSWERS

Q: If you already have a State Response Grant (128(a) for \$2 million, are states eligible to apply for community-wide assessment grants for an additional \$2 million?

A: Yes.

Q: If the state already has experience submitting applications through grants.gov, is a week submittal prior to the deadline still recommended?

A: Please try to submit your application as early as possible to ensure there is enough time to resolve any unforeseen administrative issues.

Q: Will contact information be redacted from the proposal before it's made public? Or do we need to specifically state that?

A: If contact information contains personal data such as home telephone numbers or emails, EPA policy is to redact that information. Applicants should indicate on the Narrative Information Sheet all information that they do not want to be disclosed as confidential.

Q: Who reviews the narrative part of the applications?

A: As stated in Section V.C. of the Assessment Grant guidelines: "All applications that pass the threshold criteria review will be evaluated by national evaluation panels. The national evaluation panels will be comprised of EPA staff and potentially other federal agency representatives chosen for their expertise in the range of activities associated with the brownfield assessments."

Q: If the applicant is also the state environmental regulatory agency, is the state letter still needed?

A: No

Q: State agencies (not the environmental agency) don't need the environmental agency letter?

A: Consistent with the guidance in <u>FAQ</u> C.5., yes. Applicants (other than a state or tribal **environmental authority**) must provide a letter from a state or tribal environmental authority that acknowledges the applicant's planned activities in their grant application.

Q: Is it anticipated that this new assessment funding opportunity specifically for states and tribes be offered in future years?

A: We do not have that information at this time.

Q: How many of these types of grants do you anticipate awarding?

A: Currently, EPA plans to award 9 grants. However, the final number of awards is subject to the quality of applications received and the availability of funds.

Q: How would a state apply for a community-wide assessment for a specific city or town instead of through this grant?

A: The state could apply for the 'regular' community-wide assessment grant for up to \$500,000 and partner with the city/town.

Q: Are support letters needed from the community within the target areas?

A: As stated on slide 7, there are no required attachments for this grant type. Attachments that are included that are not required will not be reviewed.

Q: Wyoming is the least populous state in the union, with very few metropolitan areas. Will this be a criterion where we lose points due to low population/mainly rural areas?

A: What is important is that your target area demonstrates that it contains disadvantaged communities that need the support of this grant. Both metro and non-metro communities/target areas can be the focus area of this grant.

Q: Regarding the MSA/ non-MSA areas - I believe the entity of the state of NJ is in an MSA - there are no non-MSAs areas - so how will EPA score this?

A: EPA has identified the following states/territories only have MSAs or do not have any MSAs. EPA will contact each entity to provide additional guidance.

States/Territories with only MSAs

- 1. Rhode Island
- 2. New Jersey
- 3. Delaware
- 4. District of Columbia
- 5. MA has two non-MSAs, but those areas most likely don't have BF sites (Martha's Vineyard and Nantucket)

States/Territories with no MSAs

- 1. American Samoa
- 2. Guam
- 3. Virgin Islands
- 4. Northern Mariana Islands

Q: As shown on the Other Factors, it is a good thing or a bad thing to spend 30% (OR MORE) of the grant on eligible planning activities? If this factor is checked (chosen), will it be looked at favorably or unfavorably by EPA?

A: The Other Factors and Considerations in Section V.B. of the Guidelines have no bearing on the merit of the application and are therefore not reviewed more or less favorably.

In making the final selections from among the most highly ranked applicants on each of the lists discussed in Section V.C., EPA's Headquarters Selection Official <u>may</u> consider the factors as appropriate. There is no requirement or guarantee that any of the other factors or considerations will be applied during the final selection.

If the planning other factor is applied, an application that allocates 30% of the budget toward reuse/area-wide planning is viewed the same as an application that allocates 40% of the budget toward reuse/area-wide planning.

THRESHOLD CRITERIA QUESTIONS AND ANSWERS GENERAL QUESTIONS & ANSWERS

General

Q: Are Alaska tribal consortium eligible to apply, or just native corporations?

A: Alaska tribal consortia comprised of ineligible tribes are not eligible to apply.

Q: Can the state grant include communities with an existing grant? Also, can the state grant include sites in communities/cities that may be submitting their own independent application this coming year?

A: Yes, to both questions. No threshold criterion precludes a state from proposing to carry out assessment activities in a community/city that has a current community-wide assessment grant or is applying independently for FY 22 community-wide assessment grant.

Q: For the list of Priority Sites & Target Areas, do we list those on both the Threshold Criteria sheet and the Narrative information sheet or just the Narrative information sheet?

A: For threshold purposes, you will list the priority sites and target areas on the Narrative Information Sheet. You will include them again in your response to the Narrative/Ranking criteria as appropriate in your response to each individual criterion.

Target Areas

Q: Target areas can be city blocks, a city as a whole, county. Can it also be an entire region (e.g., the Northern part of a state)?

A: We leave it to the applicant to determine the target areas. Here is the text from the guidelines on page 32:

• List the target areas and the priority sites discussed in the Narrative (at least three target areas and at least five priority sites, with at least one priority site in each target area).

- State applicants only:
 - For each target area that is smaller than a city/town, list the census tract number(s) within the target area. (Please see the FY22 FAQs for guidance on how to find a census tract.)
 - o Provide the address of the priority sites proposed in the Narrative.

Q: Is there a definition anywhere for "target area"?

A: There isn't a specific definition for a target area. It essentially is whatever the applicant wants to define it as, but the applicant should be able to identify the socioeconomic data that will help explain the area's challenges that are going to be addressed through the grant.

Q: I'm a state agency... Should my target areas be specific cities or can I clump cities together in categories, like "Route 66 towns" or "oilfield towns" and have the categories be the target areas?

A: Applicants have discretion on how to describe their target areas. EPA is not requiring a particular format. We suggest that applicants provide an explanation of the approach taken.

Contracts/Subawards

Q: For states, if they have existing on-call contracts, can they use these contractors?

A: Yes. States follow their own policies and procedures on competitive procurement as provided in 2 CFR 200.317.

Q: If our narrative proposal includes subawards to cities/towns, do we just need to state that they're an eligible subrecipient as a city/town?

A: Yes.

Q: Being as Universities are ineligible to apply for this grant, are they eligible as subrecipients for a subaward?

A: Yes.

Q: If we include a subrecipient on this application, you mentioned that they would need to be an eligible entity (such as non-profit or unit of gov't). If there is not a state entity would they be eligible under this grant?

A: Are you asking whether entities such as nonprofits and local governments that are not state agencies are eligible subrecipients? If so, the answer is yes--nonprofits and local governments are eligible subrecipients.

Q: Can a Tribe be a subrecipient to a state and vice versa?

A: Yes.

Q: Can a non-federally recognized tribe apply for or be a subrecipient of the grant if it teams up with a federally recognized tribe?

A: Ineligible tribes cannot apply for the assessment grant. If an eligible tribe chooses to provide a subaward to an ineligible tribe, that practice is permissible under EPA's Subaward Policy. Note that the non-federally recognized tribe must be a legal entity such as an

incorporated nonprofit organization to be an eligible subrecipient. For-profit organizations and individual consultants are not eligible subrecipients.

Q: Is there any cap to the number/amount of subaward(s) that can be utilized by this Assessment Grant?

A: No. However, EPA will evaluate the degree to which the applicant's organization has the capacity to carry out the programmatic, administrative, and financial requirements to successfully manage the project and grant. (See IV.E.4.a.i. *Organizational Capacity*).

PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION QUESTIONS & ANSWERS

Q: Will proposals that include more than 5 priority sites be ranked more favorably?

A: There is no evaluation criterion that considers more than 5 priority sites to be evaluated more favorably.

COMMUNITY NEED AND COMMUNITY ENGAGEMENT QUESTIONS & ANSWERS

Q: Can you mention that you have gathered letters of support?

A: Yes, you may mention that information in the Narrative, but do not attach any letters of support to your application.

TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS QUESTIONS & ANSWERS

Q: Does the \$200,000 per site limit apply?

A: Yes.

Q: For eligible planning activities, is it reviewed more favorably to use 10% versus 30% for planning activities?

A: No, there is no evaluation criterion that states that applications with more funding for planning will be reviewed more/less favorably. However, the information provided needs to be cohesive throughout the narrative.

Q: Do incorporating in-kind resources result in a ranking advantage?

A: There is no evaluation criterion that considers incorporating in-kind resources more favorably. However, the information provided needs to be cohesive throughout the narrative.

Q: If the recipient is prepared to spend its own in-kind resources on travel or other cost categories, I definitely understand it won't be in the budget. But should we explain these in-kind resources somewhere in this section? Will that be looked upon favorably?

A: As stated on page 41 of the Assessment Grant Guidelines, you can discuss in-kind resources in response to Project Implementation. There is no evaluation criterion that states that projects with in-kind resources will be evaluated more favorably.

PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE QUESTIONS & ANSWERS

Q: What is considered "recent"?

A: There is no definition for "recent". Use the "most recent" information you have.

Q: If we only have received our 128(a) grants (no other EPA BF cleanup or assessment grants), should we also include two other examples of similar grants or just focus on the multiple 128(a) grants.

A: Criterion 4.b. *Past Performance and Accomplishments* requires applicants to select one of three options. "If you have ever received an EPA Brownfields Multipurpose Grant, Assessment Grant, Revolving Loan Fund Grant, Cleanup Grant, and/or 128(a) Grant please respond to item i. below."

Q: Does the requirement for Assessment grant recipients to note "what percentage of the most recent Assessment Grant funds were spent on direct assessment tasks/ activities" apply if the grant just started Oct. 1, 2021? Or should we include older grants instead (e.g., a BCRLF that's a year old/ current 128a funding)?

A: This requirement only applies to previous Assessment Grants. We suggest not skipping over any criterion and to explain why the criterion does not apply.